

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 SAN JOSE DIVISION
4

5 UNITED STATES OF AMERICA,

6 Plaintiff,

7 v.

8 JIZHONG CHEN,

9 Defendant.


Case No. 5:19-cr-00056-EJD

~~PROPOSED~~ ORDER MODIFYING
THE INTERIM PROTECTIVE ORDER

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11 Good cause appearing, it is ordered that that the following definitions and procedures will
12 govern the designation and handling of material and other information produced by Apple in
13 response to the subpoena, while reserving the question of how such material and information
14 should be handled at trial, and during pre- or post-trial hearings for a future time:

- 15 1. Apple may designate documents it produces pursuant to the subpoena under the
16 “Confidential” or “Highly Confidential” tiers of the protective order;
17 2. Confidential material can be Apple trade secret or confidential business
18 information, in addition to any material that might otherwise be designated
19 confidential under the protective order;
20 3. Highly confidential material can be any confidential material Apple contends
21 should be AEO; and
22 4. No defense expert who is a current employee of an entity participating in the
23 autonomous vehicle industry or a competitor of Apple Inc. may review or have
24 any access to confidential or highly confidential material that Apple produces
25 pursuant to the subpoena.

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27 Dated: May 2, 2022

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Hon. Edward J. Davila
United States District Judge